To: Moore, Gary[Moore.Gary@epa.gov]; Delgado, Paige[Delgado.Paige@epa.gov]
Cc: Sean Gavlas[Sean.Gavlas@WestonSolutions.com]
From: Don Edgington[d.edgington@erllc.com]
Sent: Tue 10/16/2018 7:50:38 PM (UTC)
Subject: Disposal RFQs
RFQ F6-308 TD TSCA Soil 10-22-18 1PM ET.pdf
RFQ F6-308 TD Low Level PCB Contaminated Soil and Debris 10-22-18 1PM ET.pdf

Good afternoon.

The attached was sent out to qualified bidders for both the TSCA and non-regulated contaminated soils this morning. The non-regulated contaminated soils (<50 ppm PCB) also included a separate line item for construction and demolition debris.

Bidders included:

- Republic Services
- Clean Harbors; and
- ACT Environmental Services.

Bids are due next Monday (10/22/18) at 12:00 CST.

The site assessment data that Evan forwarded me was included as an attachment. We will need to forward the bidders the Pace Analytical data once it is available (TCLP).

Thanks,

Don

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

CONSENT FOR ACCESS TO PROPERTY

Name of Owner: Frank J. and Marie Doyle

Address/Description of Property:
905 N. Poplar
Leonard, TX 75452
(Former Frank J. Doyle Salvage)

I consent to officers, employees, contractors, and authorized representatives of the U.S. Environmental Protection Agency (EPA) entering and having continued access to my property for:

1. Conducting cleanup of hazardous substances spilled to the soil as a result of historic salvage operations conducted by Frank J. Doyle Salvage as determined appropriate by the EPA;
2. Conducting demolition of the onsite structures on the property including the building, slab, concrete containment, and any other structures on the property;
3. Utilizing the property as a consolidation point for off-site contaminated soils prior to transportation for disposal;
4. Utilizing the property for equipment storage while cleanup actions are ongoing;
5. Restoring the property to grade with clean soil and/or rock as determined appropriate by the EPA;
6. Taking of such samples as may be determined necessary by the EPA during the course of its cleanup actions;
7. Conduct of other actions as may be deemed necessary by EPA to protect human health and the environment;

I recognize that these actions by the EPA are undertaken in accordance with its response and enforcement authorities contained in the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9601 *et seq.*

I am the property owner, and I warrant that I have the authority to enter into this access agreement. This written permission is given by me voluntarily with knowledge of my right to refuse and without threats or promises of any kind.

Date

Print & Sign

Title

Phone Number

Please indicate if you are allowing access and your decision about sharing your results:
( ) Yes, I will allow EPA to have access.
( ) No, I do not want the EPA to have access

REPUBLIC SERVICES **SPECIAL WASTE PROFILE**

PRINT

Requested Disposal Facility: 3416 Maloy Solid Waste LF TX

Waste Profile #

Saveable fill-in form. Restricted printing until all required (yellow) fields are completed.

Sales Rep #:

I. Generator Information

Generator Name: EPA Region 6 / FJ Doyle Salvage Site			
Generator Site Address: 903 N. Poplar			
City: Leonard	County: Fannin	State: Texas	Zip: 75452
State ID/Reg No:	State Approval/Waste Code: N/A (if applicable)		NAICS # : 562910
Generator Mailing Address (if different): ☐ 1445 Ross Avenue, Suite 1200			
City: Dallas	County: Dallas	State: Texas	Zip: 75202-2733
Generator Contact Name: Gary Moore, Federal On-Scene Coordinator		Email: moore.gary@epa.gov	
Phone Number: (214) 665-6609	Ext:	Fax Number:	

II. Billing Information

Bill To: Environmental Restoration, LLC		Contact Name: Don Edgington	
Billing Address: 1666 Fabick Drive		Email: d.edgington@erllc.com	
City: Fenton	State: Missouri	Zip: 63026	Phone: (251) 406-0220

III. Waste Stream Information

Name of Waste: Non-Regulated Contaminated Soil	
Process Generating Waste: Federal cleanup of former scrap metal recycler. Excavation and removal of non-regulated, non-hazardous soils (less than 50 ppm PCB). Soil is Non-RCRA characteristic and Non-TSCA regulated as demonstrated by attached analysis.	
Type of Waste:	☐ INDUSTRIAL PROCESS WASTE ☐ POLLUTION CONTROL WASTE
Physical State:	☐ SOLID ☐ SEMI-SOLID ☐ POWDER ☐ LIQUID
Method of Shipment:	☐ BULK ☐ DRUM ☐ BAGGED ☐ OTHER:
Estimated Annual Volume:	5,000 Tons
Frequency:	☐ ONE TIME ☐ ONGOING
Disposal Consideration:	☐ LANDFILL ☐ SOLIDIFICATION ☐ BIOREMEDIATION

IV. Representative Sample Certification

☐ NO SAMPLE TAKEN

Is the representative sample collected to prepare this profile and laboratory analysis, collected in accordance with U.S. EPA 40 CFR 261.20(c) guidelines or equivalent rules?	☐ YES or ☐ NO
Type of Sample: ☐ COMPOSITE SAMPLE ☐ GRAB SAMPLE	
Sample Date: 10/04/18	
Sample ID Numbers: Pace Laboratory Report 7595992 - Sample No. FJD-WP2-20181004 and FJD-WP3-20181004.	

REPUBLIC SERVICES **SPECIAL WASTE PROFILE**

PRINT

Waste Profile #

V. Physical Characteristics of Waste

Characteristic Components	% by Weight (range)
1. Soil	80 - 100%
2. Debris, concrete, metal, glass, wood, rock	0 - 20%
3. Trash, PPE	0 - 5%
4.	
5.	

Color	Odor (describe)	Does Waste Contain Free Liquids?	% Solids	pH:	Flash Point
varies	none	☐ YES or ☐ NO	100%	n/a	n/a °F

Attach Laboratory Analytical Report (and/or Material Safety Data Sheet) Including Chain of Custody and Required Parameters Provided for this Profile

Does this waste or generating process contain regulated concentrations of the following Pesticides and/or Herbicides: Chlordane, Endrin, Heptachlor (and its epoxides), Lindane, Methoxychlor, Toxaphene, 2,4-D, or 2,4,5-TP Silvex as defined in 40 CFR 261.33?	☐ Yes or ☐ No
Does this waste contain reactive sulfides (greater than 500 ppm) or reactive cyanide (greater than 250 ppm)[reference 40 CFR 261.23(a)(5)]?	☐ Yes or ☐ No
Does this waste contain regulated concentrations of Polychlorinated Biphenyls (PCBs) as defined in 40 CFR Part 761?	☐ Yes or ☐ No
Does this waste contain concentrations of listed hazardous wastes defined in 40 CFR 261.31, 261.32, 261.33, including RCRA F-Listed Solvents?	☐ Yes or ☐ No
Does this waste exhibit a Hazardous Characteristic as defined by Federal and/or State regulations?	☐ Yes or ☐ No
Does this waste contain regulated concentrations of 2,3,7,8-Tetrachlorodibenzodioxin (2,3,7,8-TCCD), or any other dioxin as defined in 40 CFR 261.31?	☐ Yes or ☐ No
Is this a regulated Radioactive Waste as defined by Federal and/or State regulations?	☐ Yes or ☐ No
Is this a regulated Medical or Infectious Waste as defined by Federal and/or State regulations?	☐ Yes or ☐ No
Is this waste a reactive or heat generating waste?	☐ Yes or ☐ No
Does the waste contain sulfur or sulfur by-products?	☐ Yes or ☐ No
Is this waste generated at a Federal Superfund Clean Up Site?	☐ Yes or ☐ No
Is this waste from a TSD facility, TSD like facility or consolidator?	☐ Yes or ☐ No

VI. Certification

I hereby certify that to the best of my knowledge and belief, the information contained herein is a true, complete and accurate description of the waste material being offered for disposal and all known or suspected hazards have been disclosed. All Analytical Results/Material Safety Data Sheets submitted are truthful and complete and are representative of the waste.

I further certify that by utilizing this profile, neither myself nor any other employee of the company will deliver for disposal or attempt to deliver for disposal any waste which is classified as toxic waste, hazardous waste or infectious waste, or any other waste material this facility is prohibited from accepting by law. I shall immediately give written notice of any change or condition pertaining to the waste not provided herein. Our company hereby agrees to fully indemnify this disposal facility against any damages resulting from this certification being inaccurate or untrue.

I further certify that the company has not altered the form or content of this profile sheet as provided by Republic Services Inc.

Authorized Representative Name And Title (Type or Print) | Company Name

Authorized Representative Signature | Date

PRELIMINARY ASSESSMENT REPORT

Doyle, Frank J.

EPA ID NO. TXD980865109

LEONARD, FANNIN COUNTY, TEXAS

May 1997

Prepared for:

Environmental Protection Agency

Dallas, TX

Fluor Daniel, Inc.
Submitted by:

for Wendy Bigley
Project Geologist

Fluor Daniel, Inc.
Approved by:

Bill Park
Project Manager

Table of Contents

Figures

Attachments

1.0 INTRODUCTION

Under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA), the U.S. Environmental Protection Agency (EPA), Waste Management Division, Region 6 conducted a Preliminary Assessment (PA) at the Doyle, Frank J. site in Leonard, Fannin County, Texas. The purpose of this investigation was to collect information concerning conditions at the site sufficient to assess the threat posed to human health and the environment and to determine the need for additional CERCLA/SARA or other appropriate action. The scope of the investigation included review of available file information, a comprehensive target survey, and an onsite reconnaissance.

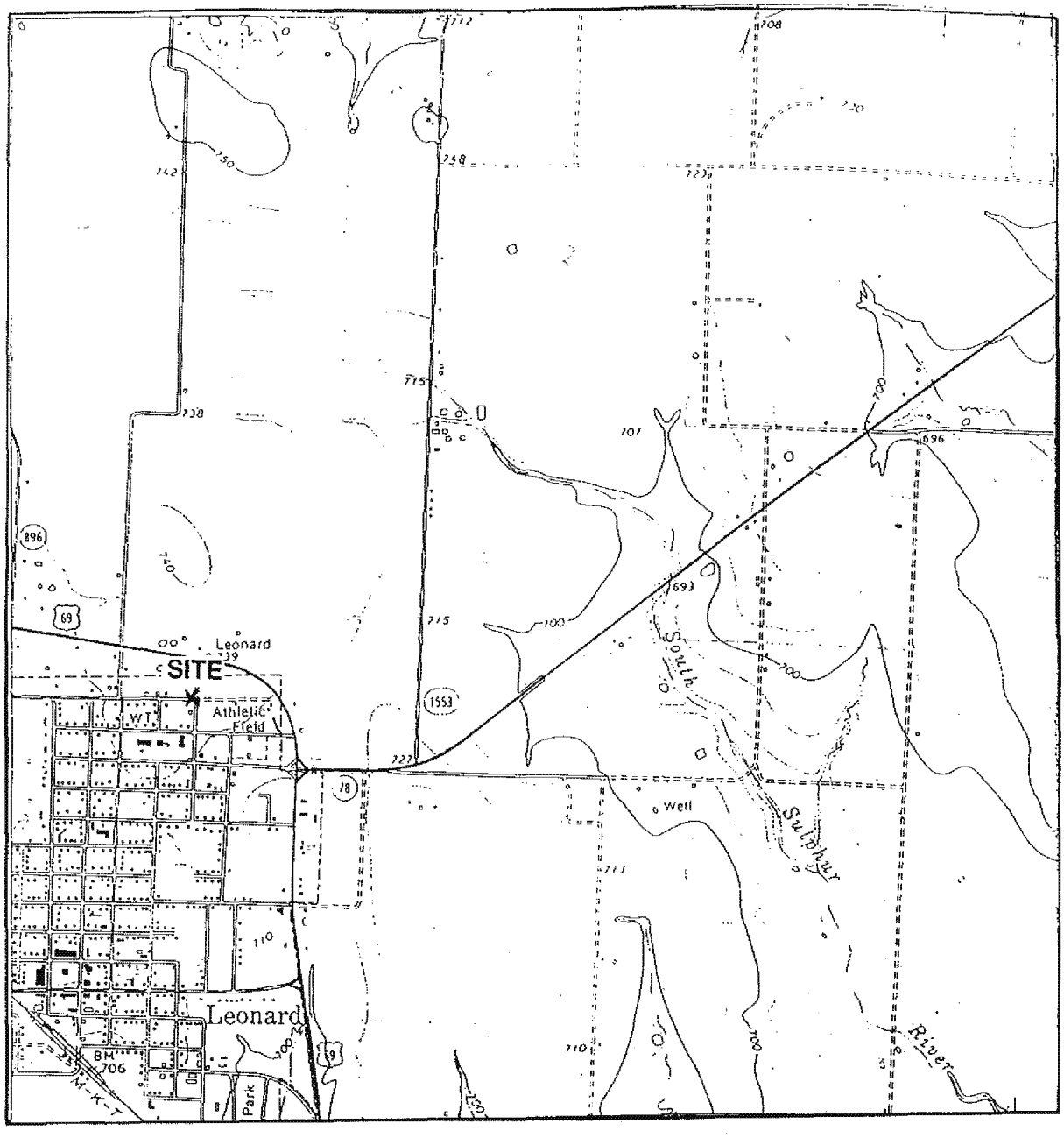
2.0 SITE DESCRIPTION, OPERATIONAL HISTORY, AND WASTE CHARACTERISTICS

2.1 Site Description

The Doyle, Frank J. site, hereafter referred to as the Frank J.Doyle Transformer site is located at 305 E. Cottonwood in a predominately residential area of Leonard, Fannin County, Texas (Figure 1- Site Location Map). The geographical coordinates are 33° 23' 23" North latitude and 96° 14' 34" West longitude (Figure 1). To reach the site from Dallas, travel north on Hwy 78, turn west on Hackberry Street, then north on Poplar Street. The site is located on the corner of Poplar and Cottonwood. The site is bound on the north, south, and west by residential homes and the Leonard High School to the east (Figure 2- Site Sketch).

Frank J. Doyle Transformer site is approximately 0.6 acres in size (Figure 2). There is one shop building located on site. The shop houses two draining tables used to drain residual oil out of transformers. The yard of the site consists of a cement drive and gravel ground cover. In the southwest corner of the site is a concrete pad that is used to store 55 gallon drums and three (two 500 gallon and one 375 gallon) tanks located inside a concrete containment area. The used oil storage area is also the point where the used oil is vacuumed out via a vacuum truck and hauled off site for disposal. The gravel yard consists of storage for various sizes of transformers. The yard also contains a twenty yard dumpster that stores general shop refuse. The site is completely surrounded by a wooden fence. There are three gates that lead onto the property located on the north, east and west sides (Figure 2). The gates are secured and locked after business hours.

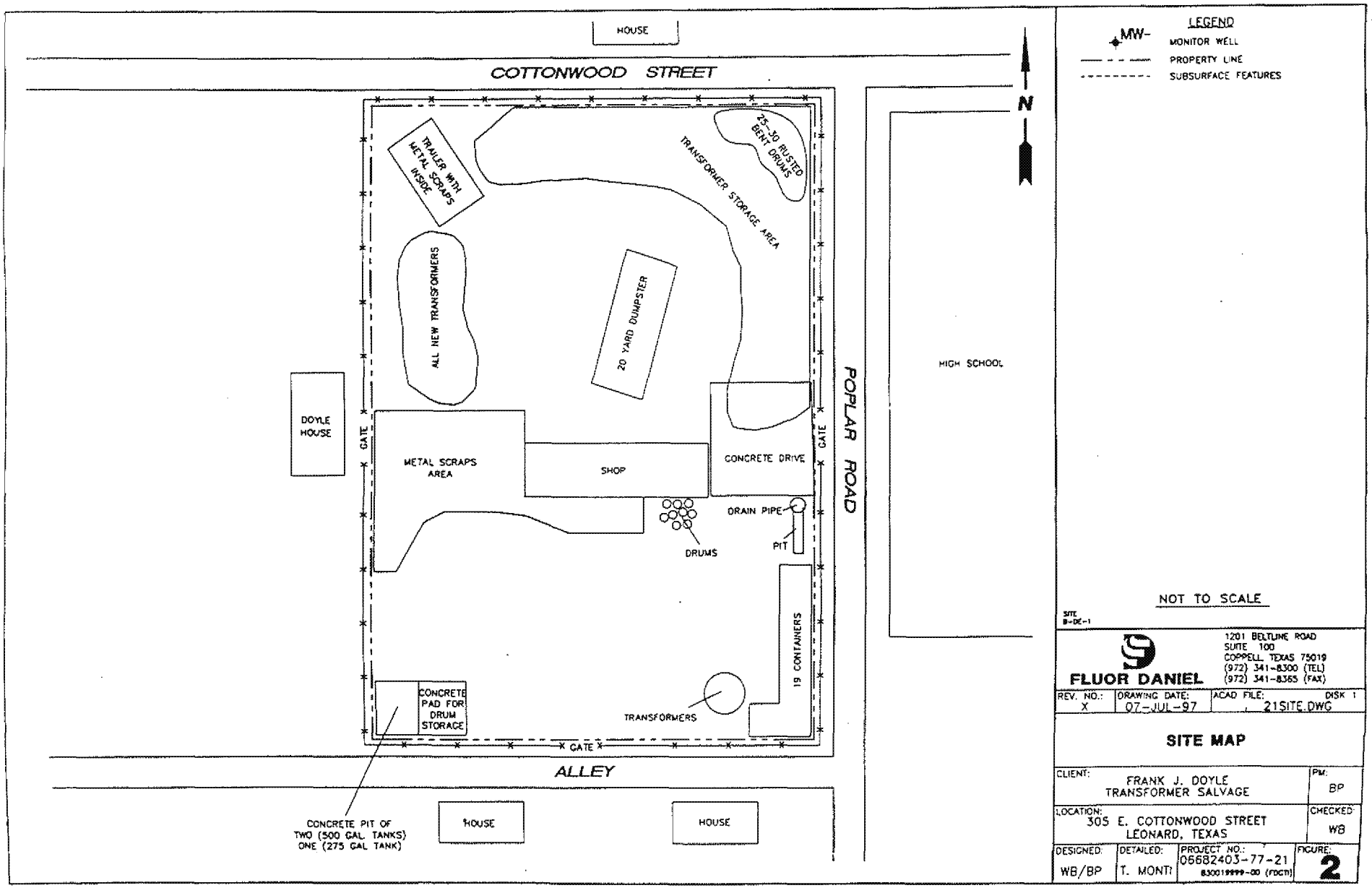
A site reconnaissance was conducted by Fluor Daniel on May 20, 1997. This site is currently active and



Note: USGS 7.5' Topographic Map, Leonard, TX Quadrangle, 1964.

FLUOR DANIEL

FIGURE 1
SITE LOCATION MAP
Doyle, Frank J.
EPA ID No. TXD980865109
Leonard, Collin County, Texas



is bordered by residential properties to the north, south and west, and Leonard High School to the east (Figure 2). The owner, Mr. Frank J. Doyle, retired in January 1997 and his son, Gary Doyle currently operates the business. The site reconnaissance revealed evidence of soil contamination with yellowish/green staining of the soil (Photos #7 & 8). In addition to the staining on the ground, the area around the shop showed signs of deterioration and staining (Photo #8). The site is located on relatively flat terrain that slopes gently toward the northeast boundary (Figure 1).

2.2 Operational History

Frank J. Doyle Transformer is currently active and has been in operation since approximately 1974. Mr. Doyle obtains transformers from companies in Texas, Oklahoma, Louisiana and Arkansas. Salvage operations involve recovering oil, wiring and scrap metal from the transformers. Before salvage operations begin, the used oil is pumped out of the transformers and placed in a storage tank located in the southwest corner of the property. The transformer is then placed on a draining table to allow any residual oil to displace. The remaining oil is placed in 55 gallon drums which are stored on a concrete pad also located in the southwest corner of the property. From the late 1970's to early 1980's, the site only accepted non-Polychlorinated Biphenyls (PCB) transformers [Reference 1, pg. 1]. Prior to that, Mr. Doyle used transformer oil for weed control and has distributed the oil to various individuals throughout Leonard for use as a weed killer [Reference 2, pg. 3].

Mr. Frank J. Doyle registered with the Texas Water Commission (TWC) now called the Texas Natural Resources Conservation Commission (TNRCC) in 1993 for various non-hazardous waste generated on site such as; 1.) used oil from non-PCB transformer being scrapped for salvage, 2.) ash residue from furnace used to remove varnish from copper wire, 3.) general plant refuse from office and shop, 4.) various storage containers for used oil including one 375 gallon, two 500 gallon and 55 gallon drums that are stored on a concrete pad located on the southwest corner of the property (Photos # 11&13), 5.) high temperature oven to burn varnish off copper and 6.) a four yard dumpster for the accumulation of plant trash (Photo #15). The registration reflects hazardous and/or industrial waste generated and management activities for which Mr. Doyle has provided notification [Reference 3, pp. 2-25].

2.3 Waste Characterization

Past site inspections of Frank J. Doyle Transformer include a Site Assessment sampling investigation conducted by the Ecology & Environment's Technical Assistant Team (TAT) on October 12, 1990 and

5/20/97

Site Recon: W. Bigley / K. Westberry
- met w/ Gary Doyle (Frank Doyle's Son)
- K. Westberry took Pictures of Site:

1.) #27 10:05 facing West. Site Entrance
2.) #26 10:03 facing East - Sched adjacent to Site
3.) #25 10:05 North. Along east fence boundary shows transformers w/ used empty drums
4.) #24 10:08 Showing tag on transformer
5.) 23 10:09 facing west. Looking down North fence boundary.
6.) #22 10:12 transformers w/ Sample dates labelled on top of them
7.) #21 10:15 facing South: Along west fence boundary
8.) 20 10:15 tag on transformers
9.) 19 10:16 SW Old transformers that look to have leaked.
10.) #18 10:17 S Copper Salvage outside of Shop
11.) #17 10:19 SE Copper Salvage
12.) #16 10:20 View of inside of the 4yd dumpster
13.) #15 " View of outside of dumpster (Lg. vessel inside)
14.) #14 10:21 West: View of PCB contamination outside of Shop (Note: Yellow Staining) N side of Bldg.
15.) #13 10:25 16 unlabelled drums. Only drum in forground has label.
S location of oil pumping takes
16.) #12 place Was hauled off
17.) #11 W Shows tank hold
18.) #10 NW Top of drum in tank hold labelled Methel Formcell 55%

06W001

Temporary number: 88888 7-23-93 Annie Morales

Permanent number: 80951 7-28-Annie Mora

Solid Waste Transporter Notification Form

X Company Name F J DOYLE SALVAGE TRANSFORMERS

X Headquarters Location 305 E. COTTONWOOD, BOX 312,

X Branch Address LEONARD TX

Zip 75452 County FANNIN Phone 903-587 3342

Site Location —

Contact Person F. J. DOYLE

TWC Registration No. 80951 EPA Identification No. _____

RRC Registration No. _____

Carrier Classification: Private X For Hire: Common ____ Contract ____

Interstate X Intrastate ____ Foreign: In ____ Out ____

Transportation Mode: Hwy X Rail ____ Water ____ Air ____

Fleet Size 1 TRUCK.

Operating Area TEXAS, LOUISIANA

Freight Classification: Hazardous waste _____

Class I Non-Hazardous waste X

U.S. DOT Hazard Classes _____

Or Chemical Types ELECTRICAL TRANSFORMERS

I certify that the information herein is complete and accurate to the best of my knowledge:

F J Doyle 7-21-93

Signature and Title Date

Temporary # given 7-23-93, by Annie Morales

88888

03 004

HEALTH AND SAFETY PLAN
FOR
SCREENING SITE INSPECTION FIELD WORK
DOYLE, FRANK J. (a.k.a Frank J. Doyle Transformer Site)

Prepared by

Texas Natural Resource Conservation Commission
Superfund Site Discovery and Assessment Team
Austin, Texas

Reviewed and approved by

Site Safety Officer:	Name	Date
Site Investigation: Manager	Name	12/17/97 Date
PA/SI Program Manager Representative:	Name	12/18/97 Date
TNRCC Central Office Health & Safety Representative:	Name	12/18/97 Date

December 1997

Contents

SECTION 2

SITE INFORMATION

GENERAL INFORMATION

Site: Doyle, Frank J., aka: Frank J. Doyle Transformer Site, TXD980865109

Location: The Frank J. Doyle Transformer site is an active metal salvage yard (SWR# 80951) that occupies 0.6 acres located at 305 E. Cottonwood Street, Leonard, Texas in Fannin County. The site consists of a shop and storage areas surrounded by a 6'-high wooden perimeter fence. The geographic center of the site is 33° 23' 23" N Latitude and 96° 14' 34" W. The site is located in a residential area in the northeast portion of the city adjacent to Leonard High School. The alleyway south of the site is accessed by the public frequently and the nearest residence is located 40' south of the site.

Mailing Address: F. J. Doyle Salvage Transformers
305 E. Cottonwood Street, Box 312
Leonard, TX 75452

Proposed date of field work: January, 1998

Hazard Assessment: ___ High ___✓___ Medium ___ Low

___ None ___ Unknown

Site description: The owner, Frank J. Doyle, began salvage operations in 1974 and operated at the site until his retirement in January 1997. The owner resides next to the site. His son, Gary Doyle, now operates the facility. Used transformers are received from suppliers in Texas, Oklahoma, Louisiana and Arkansas, off-loaded, drained, copper cores removed, baked to remove varnish, paper and residual oil and stripped for recoverable metals. Drained transformer oils are stored on-site in tanks or drums and subsequently shipped to a recycler. Suppliers are required to test shipped transformers for PCBs <40 parts per million (ppm). According to the owner, transformers were not tested prior to 1980.

Based on an EPA site assessment and results of soil samples collected on July 10-12, 1995, the site has three on-site areas (depth 0"-24") with polychlorinated biphenyls (PCB) contaminated soils ranging from 2.7 mg/kg to 1,590 mg/kg and three off-site areas ranging from 1.57 mg/kg to 2,730 mg/kg at varying depths (0"-6", 6"-12", 12"-18" and 18"-24") along the site perimeter. A May 20, 1997 PA identified two city wells and adjacent residential yards/public schools as potential targets.

SCOPE OF WORK SUMMARY

The field team will collect groundwater and soil samples. Samples to be collected include a total of four (4) groundwater samples, nineteen (19) soil samples, two (2) rinsate samples and three (3) field blanks. These include three (3) background soil samples collected from unaffected upwind/upgradient locations within one mile of the site and one (1) background groundwater sample collected from an off-site upgradient public drinking water well located within two miles of the site for attribution of site contaminants. A duplicate sample will be collected for each matrix each day.

All samples will be collected according to the procedures outlined in the QAPP (Appendix E).

No air samples are planned to assess releases to the air pathway. In addition, no sediment samples are anticipated since there are no perennial streams or receptor bodies of water located within the required 2-mile target distance limit.

SITE/CHEMICAL CHARACTERISTICS

Chemical type(s):	✓ Liquid	✓ Solid	___ Sludge	___ Gas
Characteristic(s):	___ Corrosive	___ Ignitable	___ Radioactive	
	___ Volatile	___ Toxic	___ Reactive	
	___ Unknown	✓ Other		

Summary of known wastes: See below.

List of hazardous substances detected onsite: polychlorinated biphenyls (Aroclor 1260) detected in soils adjacent to on-site waste management units and off site.

Description of all known waste disposal areas on site: Know waste disposal areas include: (1) surface soils in the transformer storage area located in the southeast portion of the site, (2) soils adjacent to the container storage area located in the southwest portion of the site, and (3) soils in the transformer off-load area located in the north central portion of the site.

Site waste management history: The site has been investigated for suspected PCB-contaminated soils by the EPA since 1990. PCB contamination suspected from discharged or spilled transformer oils were initially investigated by the EPA on July

Message

From: Moore, Gary [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D9494EB3B37241B09CE3BDEAFF4C557A-MOORE, GARY]
Sent: 11/2/2018 11:33:59 PM
To: Smith, Monica [smith.monica@epa.gov]
Subject: FJ Doyle Salvage - OT Request

Monica:

Are you going to get me some OT for Saturday, November 10 since I will not be on Phone Duty on that day? I will probably need 10 hrs.

Thanks

Gary W. Moore (6SF-ER)
Federal On-Scene Coordinator
U.S EPA Region 6
1445 Ross Ave, Suite 1200
Dallas, TX 75202-2733
Cell: 214.789.1627
moore.gary@epa.gov

Message

From: Moore, Gary [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D9494EB3B37241B09CE3BDEAFF4C557A-MOORE, GARY]
Sent: 2/17/2019 10:12:06 PM
To: LaBombard, Will [LaBombard.Will@epa.gov]
Subject: FJ Doyle Salvage - Weston Solutions

Will,

It appears that Weston is charging me travel time to/from the FJ Doyle Salvage Site. The site is less than 50 miles and therefore they are not allowed to charge for travel to and from the site (commute). I will allow them to charge the travel time if they are transporting samples or are required to pick-up equipment (except for the rental truck they are using to commute to/from the site). I am not allowing anyone that is within 50 miles of the site to charge travel time to/from the site.

For example, I live 41.5 miles from the site and I do not get to charge my travel time to/from the site. Also, I have to drive from my house to the Fairview Fire Station to pickup the EPA truck and then commute to/from the fire station to the site which is 37.8 miles.

For Weston, it is 46.2 miles from their office to site based upon MapQuest.

I need a response back from you confirming that you guys are not going to allow them to charge their commute time to/from the site as this is against the travel rules.

Thanks,

Gary W. Moore (6SF-ER)
Federal On-Scene Coordinator
U.S EPA Region 6
1445 Ross Ave, Suite 1200
Dallas, TX 75202-2733
Cell: 214.789.1627
moore.gary@epa.gov

Message

From: Sales, James [sales.james@epa.gov]
Sent: 9/26/2018 3:44:04 PM
To: Moore, Gary [Moore.Gary@epa.gov]
CC: Roberts, Lou [Roberts.Lou@epa.gov]
Subject: RE: TSCA PCB Question

Oh yes—Lou Roberts and I have worked on that recently. Lou can also give you some background. I think what happened was Superfund was alerted to this site back in 1990s, but did not coordinate with Lou or myself. So, I don't know how or why they chose 500 ppm.

TCEQ alerted us to it a few years ago. Lou and I met with a local who wanted us to clean it up, but we had no options under TSCA since the owner had no money. We discussed this with TCEQ on numerous occasions. TCEQ was trying to get an enforcement action against Danny Doyle.

I spoke with someone in Superfund about it who told me since it didn't make the priority list, it wasn't going to clean it up either.

Also, Region 6 and 4 other EPA Regions disinvested in PCB enforcement.

The cleanup level for the soil going to be less than 1.0 ppm.

From: Moore, Gary
Sent: Wednesday, September 26, 2018 10:09 AM
To: Sales, James <sales.james@epa.gov>
Subject: RE: TSCA PCB Question

Do you mind looking up the soil cleanup levels as well? I am trying to get some perspective on history of PCB cleanup requirements.

I am working on the F.J. Doyle Salvage site in Leonard, Fannin County, Texas that is a historic site EPA has been involved with since about 1990. Never got cleaned up. We have been approved to do a CERCLA Cleanup and will begin in late October/early November.

I am trying to figure out why we (EPA) did not do a cleanup back in that time frame with know offsite impacts. It appears from so documentation that we were using a 500 mg/kg level to determine if we should take action. Not sure where that came from.

See attached.

From: Sales, James
Sent: Wednesday, September 26, 2018 9:59 AM
To: Moore, Gary <Moore.Gary@epa.gov>
Subject: RE: TSCA PCB Question

It was the 1998 mega-rule that established cleanup levels in soils I think—

The cleanup level for metals is under non-porous surfaces under the cleanup standards in 761.61. I will have to look it up, but yes, I believe it is 10ug/100 sq.cm.

I'll look it up and get back to you

From: Moore, Gary
Sent: Wednesday, September 26, 2018 9:46 AM
To: Sales, James <sales.james@epa.gov>
Subject: TSCA PCB Question

Jim:

Do you know the history of the cleanup levels for PCB contamination in soils? Dates and cleanup levels established?

Also, what is the requirement for sampling of metal to be recycled and the cleanup standard? Is it 10ug/100 sq cm?

Thanks

Gary W. Moore (6SF-ER)
Federal On-Scene Coordinator
U.S EPA Region 6
1445 Ross Ave, Suite 1200
Dallas, TX 75202-2733
Cell: 214.789.1627
moore.gary@epa.gov

Message

From: Moore, Gary [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D9494EB3B37241B09CE3BDEAFF4C557A-MOORE, GARY]
Sent: 12/13/2018 3:26:58 PM
To: 'Angela Harbin' [a.harbin@erllc.com]
Subject: FJ Doyle - Dee Sutton

Angela:

I was just told that Dee's sister-in-law passed away last night and he will be demobilizing from the site maybe today or tomorrow and then returning on Sunday. That is very sad news. I feel terrible about this but I have to ask the question on how you guys plan on dealing with this demobe/mobe. I do not think that this can be charged to the Government as it is not an official demobe/remobe. I do believe that he should get paid for his mileage but that ER should be reimbursing him for those costs rather than the Government. I just want to get ahead of this and get it resolved between our people so it does not become an issue.

Thanks

Gary W. Moore (6SF-ER)
Federal On-Scene Coordinator
U.S EPA Region 6
1445 Ross Ave, Suite 1200
Dallas, TX 75202-2733
Cell: 214.789.1627
moore.gary@epa.gov

Message

From: Gavlas, Sean [Sean.Gavlas@WestonSolutions.com]
Sent: 10/5/2018 7:49:34 PM
To: Moore, Gary [Moore.Gary@epa.gov]
Subject: Henryetta Iron and Metal - PM Action Level Calculation
Attachments: Action Level Calculation - Henryetta COCs.xlsx; Action Levels.pdf

Gary,

Attached is the PM action level calculation including the COCs (not including SVOC/PAHs). There are no published exposure limits for the SVOC/PAHs listed in our COCs. You can review exposure limits here (Table Z-1, Table Z-2, Table Z-3):

https://www.osha.gov/dsg/annotated-pels/

The attached Action Levels pdf explains the calculation. We will do a similar calculation for FJ Doyle but haven't established the action level yet.

Let me know if you have any questions.

Thanks,

Sean Gavlas
Weston Solutions, Inc.
Region 6 Superfund Technical Assessment and Response Team (START)
2600 Dallas Parkway, Suite 280
Frisco, TX 75034

Cell: 609-433-8434
Office: 469-666-5560
sean.gavlas@westonsolutions.com